



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 1, 2020

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

The parties respectfully submit this written status update to the Court in the above-captioned matter. In light of the COVID-19 pandemic presently affecting New York City, the parties respectfully request that the Court adjourn this status conference for 60 days. The parties agree that an order of excludable delay is appropriate until the next status conference, based on the Court's previous complex case designation in this matter and Administrative Order 2020-14.

- Discovery
 - The government continues the process of collecting and reviewing discovery for production to the defendant on a rolling basis. Since the parties' last status letter on March 27, 2020, the government has made two discovery productions, on April 14, 2020 and May 29, 2020, totaling nearly 60,000 pages of documents. Those productions include, among other things, statements of the defendant, financial records, business records and intercepted communications. See Dkt. Nos. 40, 41.
 - The government also is awaiting responses from outstanding subpoenas, including subpoenas to the defendant and his companies. In addition, the government has submitted Mutual Legal Assistance Treaty requests for evidence in the possession of several foreign governments, including the Government of Mexico, and the government is awaiting responses to those requests.

- Trial Preparation

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cc: Cesar de Castro, Esq.
Clerk of the Court (BMC) (by ECF)